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MINUTES FOR BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING HELD 4
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DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

March 26, 1998

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Meeting Minutes of the Richards-Gebaur BCT

Place: 15471 Hangar Road, Kansas City, Missouri

Date: Wednesday, March 4, 1998

Attending:

Peter Barrett, CH2MHILL

Dale Cira, CH2MHILL

John Fringer, BEC

Guy Frazier, MDNR

Alan Friedstrom, AFBCA/DB

Kay Grosinske, AFCEE/ERB

Stan Hewins, WPI/TCAT

Robert Koke, EPA Region 7

Bob Zuiss, OLQ

Syd Courson, CCI

AGENDA ITEMS

(Bold face highlights action items, persons responsible and applicable due dates.)

Note: Agenda items are listed numerically, although items 4, 6 and 8, which required no formal BCT action, were discussed out of order while awaiting the arrival of Bob Koke of EPA, who was briefed on the discussions.

Item 1 (Discussion of ECS Work Plan)

Dale Cira of CH2MHILL explained the work plan, which was completed Feb. 12. He stated that his firm's objective is to complete response actions "so that risk to human health and the environment are reduced to acceptable levels" at all 19 sites. The goal is NFRAPs on all sites. Cira said the task includes identifying the applicable government regulations for each site, identifying ARARs, preparing NFRAP position status for each of the 19 sites, and recommending further actions for those sites that cannot be closed by a NFRAP based on existing information.

Cira said if there is an absence of promulgated regulations and ARARs, alternative, risk-based action levels will be identified, along with additional soil and groundwater characterization needs. He said the final E&C report will depict an overall site model that includes local and regional hydrology, risk assessment, site-specific NFRAPs, contaminant-specific cleanup criteria, ARARs and recommendations for further actions, if required.

Frazier asked if there is any possibility of recommending long-term monitoring as part of a remediation. Cira said that would be considered if it were deemed appropriate, and that he did not want to close the door on any potential option. Frazier said he agreed with that, but that the Air Force seems focused on NFRAPs to the point that, "in my mind, potentially, you've already closed the door." Cira replied, "We're not trying to close the door on anything." He said the desired result is to transfer the property with minimal disruption, and be able to manage it so that future property owners or users don't have to deal with it.

Cira discussed a schedule of activities (See Attachment 1).

Draft NFRAPs will be mailed to all parties on April 13. Comments from MDNR and EPA will be due May 25.

The Draft E&C Summary report will be delivered Aug. 25, 1998, and the final E&C Report will be delivered Nov. 9.

Frazier said that if a lot of NFRAP drafts come in at once, MDNR might not be able to hold to the schedule. Cira replied that the assumption is that each draft NFRAP will be a stand-alone document, with all pertinent data included, and that each draft NFRAP will be put into the pipeline as soon as possible.

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Fringer asked if the 45-day review seems reasonable. He said, "It's really important to stress that we have a schedule and if we have any delays we want to know about them ahead of time. ... We can't say at the last minute we need another 30 days. We've got a very limited amount of time and money for this year to get things done." He said if that is not enough time, now is the time to mention it.

Frazier said he was just trying to get a firm understanding of what MDNR was buying into. He said he was just bringing it to light.

Fringer asked if 60 days would help, and Frazier said there was no way of knowing, but the easiest way would be to bring him into the picture early on specific sites so he could get a head start, which could shorten his review time substantially. Fringer agreed to this.

Items 2/3 (Presentation of proposed ARARs, other advisories, criteria or guidance that the Air Force has identified)

During the ARARs discussion by Peter Barrett of CH2MHILL (See Attachment 1) he said they must be promulgated by either the federal or state government; they must be applicable, or relevant and appropriate. He said most ARARs will tend to be chemical-specific. Location-specific ARARs would include the Endangered Species Act and executive orders that protect wetlands. He said action-specific ARARs tend to be those associated with active remediations. Stan Hewins of WPI-TCAT asked if that meant the Air Force could not determine an action-specific ARAR until there was a determination of what remediation was required, and Barrett said that could be the case.

Barrett said the work plan breaks the ARARs into probable and potential ARARs. Probable ARARs include the federal Clean Water Act and the NPDES Permit Program. He said surface water issues would be covered under the Clean Water Act, and there is an NPDES permit in place for R-G. He said it acts as a federal discharge permit and a state operating permit, illustrating how the two governments cooperate. He listed probable Missouri ARARs such as the Missouri Clean Water Law and the Missouri UST Act. He said both should be principal ARARs.

Barrett also said RCRA is a probable ARAR for R-G, as it deals with identification and listing of hazardous waste, standards for generators and transporters of hazardous waste, land disposal restrictions and UST requirements.

Barrett described potential federal ARARs, such as the Clean Air Act, the Safe Drinking Water Act and the Endangered Species Act. He said they are not probable because there is no air emission issue, nor any source of drinking water, nor endangered flora or fauna at the site.

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Barrett also listed TBCs (To Be Considered), such as soil screening guidelines, EPA screening tables, the EPA Region III risk-based concentration table and other similar guidance tools.

Cira summarized where the work plan goes now, and how ARARs will be incorporated into the NFRAPs. He said the CH2MHILL will develop site specific ARARs, focusing on the chemical compound contaminant-specific criteria. The firm will make recommendations for each site -- some will be NFRAPs, some not. CH2MHILL will perform risk assessments for the sites that don't clearly fall into one of these contaminant-specific or other promulgated ARARs, and will revise, if necessary, its recommendations for those sites.

The objective, he said, is to have complete response actions that are protective of human health that are acceptable to MDNR and EPA.

Frazier asked if the ARARs in the presentation are the only ones that would be considered, and Barrett and Cira said it was "just a starting point."

Fringer said that MDNR and EPA do not have to comment, but if they wish to comment to do so by March 26.

Item 4 (Status Report of UST closures and registration)

Zuiss said WPI contractor Monica Rakovan is reviewing the UST program. She is looking at the requirements for closure of all past and present sites. She reviewed the Richards-Gebaur UST file, including spread sheets that list all USTs, but there is additional information that has to be added. Zuiss said she would like to visit the MDNR UST Section and find out from the staff what they believe is needed to effect closure to the USTs.

Frazier asked how many USTs are still underground that are regulated.

Fringer said that on the basis of Rakovan's review of R-G files, she organized 105 USTs in five categories:

- Category I -- 49 USTs that are on non-Air Force property, where the Air Force is not responsible for closure. These are on property already transferred to the city of Kansas City.
- Category II -- 23 USTs that were removed prior to Dec. 22, 1988. The BCT still needs to determine if the sites have been cleaned-closed. Fringer said the Air Force has "confirmatory samples" to demonstrate that no suspected releases occurred.
- Category III -- 14 USTs properly closed, with MDNR closure letters.
- Category IV -- 3 USTs that are exempt because of consumptive heat usage.

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- Category V -- 16 USTs that may require action. These were closed after 1988 but there were no registration numbers or closure documentation.. Fringer said follow-up actions may include meeting with the state to resolve discrepancies and to acquire closure status for specific USTs, or to prepare appropriate and acceptable UST closure documentation.

Fringer said Rakovan plans to meet with the UST Section to discuss closure procedures, which USTs require proper closure, and to review the UST files to resolve any discrepancies, as well as to discuss with the UST Section the status of the USTs where No Further Action was requested but where no response was received.

Fringer said the contractor also wants to document the agreement between the Air Force and the current property owner that the Air Force is not responsible for any UST actions involving USTs on the affected property. Frazier asked if the Air Force intended to close all 16 USTs in Category V. Fringer replied that all of those USTs have been removed. Frazier suggested that the Air Force close out those sites prior to December, 1998, because that is when a new regulatory upgrade takes effect. Frazier said that if there are tanks in the ground, and sites have not been closed by then, the Air Force will be required to have cathodic protection, and spill and overspill protection, in place. In addition, Frazier said, there will be various penalties involved. Fringer asked if there were any tanks left, and Zuiss responded that there are some registered tanks associated with oil water separators -- holding tanks for those separators.

Item 5 (POL Yard Classification)

Frazier said the Air Force will receive its letter from MDNR about whether the POL Yard is classified as a UST or AST. He said the letter is at the program director level for her concurrence and signature. He said the MDNR's UST Section believes that if tanks held the same liquid, such as petroleum products, then they should be treated the same. Frazier said that the UST Section has proposed that the POL Yard be treated as a UST, with the exception of the off-loading facilities, the pumping station and the heating oil tank, which would be under RCRA.

Fringer said the Air Force would have a problem with that. He said a waiver (for airport-industrial use) was granted for a specific purpose.

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Cira asked for more explanation about the cleanup criteria, and Frazier -- stressing that the letter was not yet signed so nothing is official -- said Missouri's UST cleanup program would be applied. He said the two JP4 tanks, the hydrant line, the 3,200 feet between the POL and ST007, and the 560 feet from the POL to the tank fill stand and ST007, would fall under UST requirements. He said the heating oil tank, offloading dock and pump houses fall under RCRA, for that is the delivery system.

Frazier said the letter goes to the MDNR director on Friday, and it will be addressed to Fringer. Fringer pointed out that he had sent a letter Nov. 20, 1997, requesting the determination, and a few days later he was told by Don Kerns of MDNR there would be no problem getting a response by Dec. 12. Fringer said the delay has stretched four months.

Frazier said they had no idea of the time it would take, and the issues that would be involved. Frazier said the Air Force, in his mind, fares better under UST regulations than falling under RCRA.

Fringer said his concern is getting specific comments in writing. He said he requested the written comments last November, and he still had not been told when he would receive the information.

Cira said he agreed with Frazier's overall assumption that the Air Force is better off under UST, but he doesn't understand why the delivery system is under RCRA. Frazier said he was not an specialist in RCRA, but that he thinks it has something to do with the transportation component.

Fringer asked if the response to the letter would affect the work schedule. Cira said potentially. He said if his group is going to offer some proposals, even if the letter hasn't arrived. He said that Frazier's comments offers some guidance.

Item 6 (OWS965 update)

The contractor did pit sampling for water and sludge on Feb. 25. Results are expected to take two weeks. Bob Zuiss reported that an MDNR staff member observed the sampling. Zuiss said the lab analyses of the water and sludge will determine the type of disposal for those materials. John Fringer asked when the final report would be ready and Zuiss said it would be ready two to four weeks after the disposal of the materials. Zuiss said the contractor will schedule the removal of the water and sludge very quickly after the lab analysis. It could be within days but it has not been scheduled. Zuiss said the final report will cover the initial sampling, removal and closure of the facility.

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Guy Frazier asked if filling in the affected area would be part of the closure work and Zuiss said that it would and that the final report would detail that step.

The status of the OWS965 work will be an item on the May 1998 BCT agenda.

Fringer suggested that there be no discussion or comments unless there are written comments to the BCT at least a week before, to avoid getting into nebulous discussions. Frazier agreed.

Item 7 (NFRAP for AOCs)

Zuiss said that at the February BCT meeting it was decided to combine three AOC sites involving stressed vegetation into a single NFRAP. But when he got back into the files he found three distinctly different sites. The Steam Line Bleeder Release is the only one of the three that is ready for a NFRAP. Building 918 showed an area 30 square feet that had stressed vegetation, and that there was speculation -- but no evidence -- that pesticides were involved. Files on Building 603 contained a report with speculation that someone might have changed automobile engine oil in that area. Those reports came in 1994 and 1995. A visual sighting of the areas March 3 showed no sign of stressed vegetation. There are various options, Zuiss said, including sampling. Fringer said the way the 918 report is written, the 30 square foot area cannot be identified.

Frazier recommended and the BCT concurred that a NFRAP be prepared to close the Steam Bleeder Line AOC. He said the BCT had already agreed the most likely cause was steam, and that there was no information that would warrant further investigation. Frazier said as far as the buildings are concerned, there is no evidence there was anything there, but there's no evidence there wasn't. Frazier suggested sampling the areas, even if the BCT cannot pinpoint the specific area. That way, he said, the BCT has shown good faith. Koke said it appears the state will be satisfied if some sampling is done.

Hewins asked the BCT to determine now what will be done if the sampling detects a contaminant, but that it is below the action level. He said if it is above the action level, it is obvious that something must be done. Frazier said the BCT had discussed this in either 1995 or 1996, and that if something was two orders of magnitude below the action level it would be considered insignificant. Hewins said that would be 10^{-8} , based on the EPA Region VII screening table and at that level it would be real easy to find something. Frazier said he could not recall what screening level was involved when the BCT reached that decision. Frazier asked if Hewins was talking about risk-based number and Hewins said he referred to a fixed laboratory number.

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Cira pointed out that in an urbanized, industrial area, those contaminants of concern are likely to be found at those levels (10^{-8}). He said, "When the BCT agreement was made it probably had some relevance, because you were talking about some off the wall stuff. This may not be so relevant because we're not talking about off the wall stuff. Were talking about something that is commonly encountered in an urban setting. . . You may want to think about using one of those screening tables as a guideline." Cira said this will tell whether a NFRAP can be written or if more has to be done.

Frazier said he will go back and research both AOCs before he makes a decision on acceptable screening levels. **This issue and a VSI will be on the April agenda.**

Item 8 (Update on Frazier's comments on the Radiation Survey)

Fringer said that Maj. Scott Nicholson would respond to the MDNR comments. Fringer said Nicholson would send him his draft and that Fringer would turn that around as soon as possible so Frazier could have the response by mid-March, probably by March 18.

Item 9 (Discussion of Agenda for March 24-25 , 1998 Partnering meeting)

Fringer said the coordinator for the meeting wants MDNR and EPA to inform him of topics they want to discuss at the meeting. Fringer said from the Air Force perspective, it wants to discuss the process. He said it is a no-holds-barred discussion. Fringer said he wanted to invite Dr. Hewins and Kay Grosinske. He asked if MDNR wanted to invite its risk assessor, also. Frazier said he saw no reason to invite anyone else from his side because he is the one the Air Force is going to be working with.


Fringer asked if it should be limited to just the three BCT members. Frazier and Koke thought it was appropriate, but Koke later said if anyone else should be added it ought to be the members' supervisors. Alan Friedstrom said he has seen that at other partnering meetings. He said that supervisors have to buy into what subordinates do, and this might be a way to accomplish this and get buy-in. Frazier said he thought the time of the partnering meeting was premature; that it should come after CH2MHILL completes its work. Cira said partnering could be very helpful if it gets the BCT members away from numbers and into what each is trying to accomplish, to find common meeting ground. Friedstrom said scheduling appears to be a big consideration, so perhaps that is a legitimate subject for the meeting. He said that each member has other responsibilities, so knowing the schedule and letting each other know when problems are likely to occur is very helpful. **The decision on topics and who should attend was deferred. Fringer will call Frazier and Koke to reach a consensus.**

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Item 10 (Approval of January 1998 and February 1998 BCT Minutes)
Minutes approved without changes or comments.

April Agenda (Proposed)
VSI of Areas of Concern
ARARs Comments
POL Decision Letter from UST Section
Update on Registration and Closure of USTs
E&C update
OL Phasedown update
Minutes Approval

Minutes compiled and submitted by:


Syd Courson, CCI

Attachment:

1. ECS Work Plan Presentation

Objective of Study

- ✓ Incorporate 19 Sites into the Study...
 - Areas of Concern,
 - compliance sites,
 - IRP sites
- ✓ Complete the response actions so that risks to human health and the environment are reduced to acceptable levels

Work Plan Technical Approach

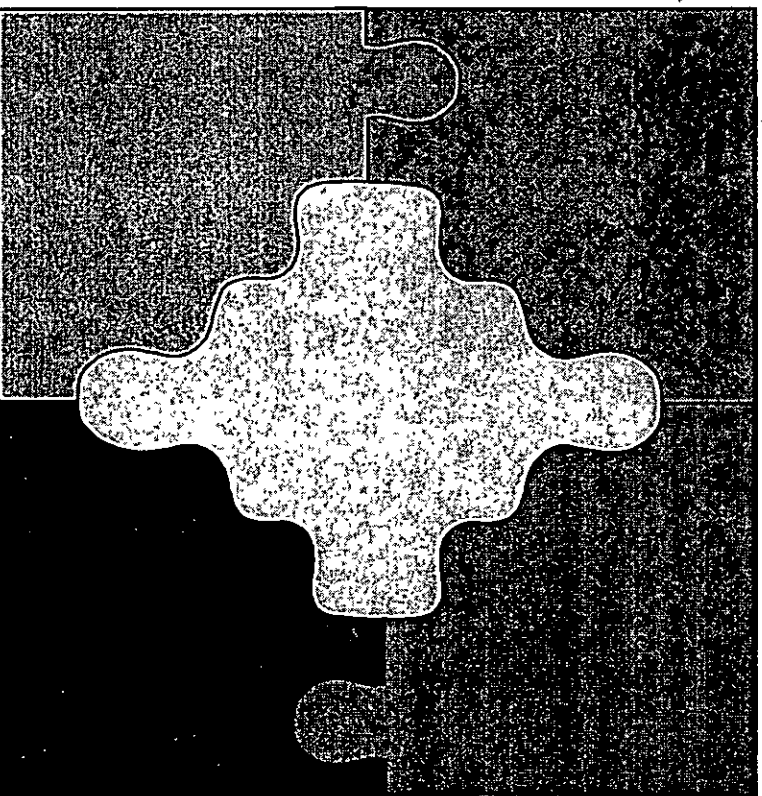
- ✓ Historical and technical review
- ✓ Identify applicable government regulations for each site
- ✓ Identify chemical-specific ARARs
- ✓ Prepare NFRAP decision status for each site
- ✓ Recommend further actions, as necessary

Work Plan Technical Approach

- ✓ Develop alternative, risk-based action levels
- ✓ Identify additional soil and groundwater characterization needs
 - Groundwater Operable Unit (OU1)
 - Soil Operable Unit (OU2)
- ✓ Assemble a comprehensive final E&C report

Final E&C report will depict an overall site model

- ✓ Local and regional hydrogeology
- ✓ Risk assessment
- ✓ Site-specific NFRAPs
- ✓ Contaminant-specific cleanup criteria
- ✓ ARARs
- ✓ Recommendations for further actions



Schedule of Activities

Event	Date Scheduled	Status
1998		
Final Work Plan	February 12	Complete
BCT/RAB	Periodic	Ongoing
Initiate On-site file Review	January 26	Complete
Draft ARARs to MDNR	March 5	Complete
Draft NERAPs to MDNR	April 13	Ongoing

Schedule of Activities

Event	Date Scheduled 1998	Comment
Final ARARs List to MDNR	April 16	
Risk Assessment	Undetermined	If needed
Fate and Transport Modeling	Undetermined	If needed
Draft E&C Summary Report	June 12 <i>Aug 25</i>	Assumes 45 days for MDNR Review
Final E&C Report	October 14 <i>Nov 9</i>	Incorporate NFRAPS

What are ARARs?

- ✓ Applicable
- ✓ Relevant
- ✓ Appropriate
- ✓ Three recognized categories:
 - chemical-specific
 - location-specific
 - action-specific

Applicable Requirements

- ✓ Cleanup standards and criteria promulgated under federal and state laws that specifically address a hazardous substance, location, or activity at a site.

Relevant requirements

- ✓ Do not fully address site conditions but address conditions *similar* to those encountered at the CERCLA site

Appropriate requirements

✓ A question of scale

- duration of the response
- form or concentration of of the hazardous substance
- nature of the release
- availability of other standards that more directly match the site conditions

Probable Federal ARARs for Richards-Gebaur AFB

✓ Clean Water Act

- NPDES Permit Program
- Criteria and Standards for NPDES
- Toxic Pollutant Effluent Standards
- Water Quality Standards
- General Pretreatment Regulations for Existing and New Sources

Probable Federal ARARs for Richards-Gebaur AFB

✓ Resource Conservation and Recovery Act

- Identification and Listing of Hazardous Waste
- Standards Applicable to Generators of HW
- Standards Applicable to Transporters of HW
- Land Disposal Restrictions
- UST requirements

Probable Federal ARARs for
Richards-Gebaur AFB

- ✓ Toxic Substances Control Act
- ✓ Hazardous Materials Transportation Act
- ✓ Occupational Safety and Health Act

Potential Federal ARARs for Richards-Gebaur AFB

✓ Clean Air Act

- National Ambient Air Quality Standards
- Standards of Performance for New Stationary Sources

– NESHAPS

✓ Safe Drinking Water Act

✓ Endangered Species Act

To-be-considered guidance for **Richards Gebaur AFB**

- ✓ Soil Screening Guidance: User's Guide and Technical Background Document (USEPA, 1996)
- ✓ USEPA Region VII Screening Table (1997)
- ✓ USEPA Region III Risk-based Concentration (RBC) Table (1997)
- ✓ USEPA Region IX Preliminary Remediation Goals (PRGs): Updated Table (1996)
- ✓ Guidance for Evaluating Technical Impracticability for Groundwater Restoration (USEPA, 1993)

Probable Missouri ARARS for Richards-Gebaur AFB

✓ MO Clean Water Law

- Water Quality Certification
- General Pretreatment Regulation
- Storm Water Regulations
- Effluent Limitations
- Water Quality Standards

✓ MO UST Act

✓ MO Water Well Driller's Act

✓ MO Hazardous Waste Management Law

Potential Missouri ARARS for Richards-Gebaur AFB

- ✓ MO Air Conservation Law
- ✓ MO Safe Drinking Water Act
- ✓ MO Solid Waste Management Law

Missouri *To-be-considered* guidance for Richards Gebaur AFB

- ✓ Emergency Standard Guide for Risk-based Corrective Action Applied at Petroleum Sites (ASTM, 1994)
- ✓ *How Clean is Clean?* Uniform Cleanup Standards for the State of Missouri (MDNR, 1995)
- ✓ Any-Use Soil Levels for Residential Settings MDOH, 1995)
- ✓ Underground Storage Tank Closure Tank Guidance Document (MDNR, 1996)

Where do we go from here?

- ✓ Develop site-specific ARARs
- ✓ Focus on contaminant-specific cleanup criteria
- ✓ Make recommendations that can be supported for Richards-Gebaur AFB
- ✓ Make recommendations for each NFRAP site
- ✓ Perform risk assessment, if appropriate.
- ✓ Revise ARARs, if needed, based on risk assessment

Evaluation and Consolidation Study Work Plan

Prepared for

Air Force Center for
Environmental Excellence